

United States District Court	DISTRICT of ARIZONA
United States of America v. Jaime Joel Rose ; DOB: 1981; U.S. Citizen Gerardo Carrillo-Ramirez ; DOB: 1979; U.S. Citizen	DOCKET NO. MAGISTRATE'S CASE NO. 12-04840M-
Complaint for violation of Title 21 United States Code § 846	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:	
<p>On or about August 3, 2012, at or near Huachuca City, in the District of Arizona, Jaime Joel Rose and Gerardo Carrillo-Ramirez, did knowingly and intentionally combine, conspire, confederate and agree with other persons to possess with intent to distribute less than 50 kilograms of marijuana, that is, approximately 45 kilograms of marijuana, a Schedule I controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).</p> <p>All in violation of Title 21, United States Code, Section 846.</p>	
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:	
<p>On August 3, 2012, at approximately 2:16 p.m., a tan 2009 Toyota sedan approached the U.S. Border Patrol Checkpoint on State Route 90 near Huachuca City, Arizona. Agents smelled the strong scent of laundry detergent coming from inside the vehicle. Excessive amounts of air fresheners are often used by smugglers in an attempt to conceal the odor of marijuana. Agents referred the Toyota to the secondary inspection area in order to question the driver and to further inspect the vehicle. A U.S. Border Patrol drug detection canine was called to the scene and alerted to an odor he had been trained to detect inside of the vehicle. Agents discovered 4 bundles of marijuana concealed inside two large duffle bags in the trunk with a total combined weight of approximately 45 kilograms. The driver, Gerardo Carrillo-Ramirez, and passenger, Jaime Joel Rose, both were arrested in connection with the seizure after stating they knew narcotics were in the trunk. Jaime Joel Rose admitted to arranging to smuggle the two duffle bags in exchange for monetary gain.</p>	
MATERIAL WITNESSES IN RELATION TO THE CHARGE:	
REQUEST DETENTION Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge. Barry/js AUTHORIZED BY: AUSA	SIGNATURE OF COMPLAINANT Alma Cabrera
Sworn to before me and subscribed in my presence.	OFFICIAL TITLE Border Patrol Agent
SIGNATURE OF MAGISTRATE JUDGE ¹⁾ <i>Leslie A. Bowman</i>	DATE August 6, 2012

¹⁾ See Federal rules of Criminal Procedure Rules 3 and 54